

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Section 63.71 Application of)	File No.
)	
Cordova Telephone Cooperative, Inc.)	
)	
For Authority Pursuant to Section 214)	
Of The Communications Act of 1934,)	
As Amended, To Discontinue)	
The Provision of Service)	
)	

**SECTION 63.71 APPLICATION OF
CORDOVA TELEPHONE COOPERATIVE, INC.**

Cordova Telephone Cooperative, Inc. (“CTC”), by its attorney, hereby applies for authority under Section 214(a) of the Communications Act, as amended (the “Act”) and pursuant to Section 63.71 of the Federal Communications Commission’s (“FCC” or “Commission”) Rules,¹ to discontinue offering landline local exchange service in the small, seasonal outpost of Strawberry Point, in Yakutat, Alaska, replacing such service with currently available and more reliable mobile broadband service. Pursuant to Section 63.71(g), CTC “has had no customers or reasonable requests for service during the 180-day period immediately preceding submission of the application.”²

¹ 47 U.S.C. § 214 and 47 C.F.R. § 63.71.

² 47 C.F.R. § 63.71(g) (stating that “the application shall be automatically granted on the 31st day after its filing with the Commission without any Commission notification to the applicant, unless the Commission has notified the applicant that the grant will not be automatically effective.”).

As required by Section 63.71(a) and (b) of the Commission's Rules, CTC is providing the following information:

Name and Address of Carrier (47 C.F.R. § 63.71(a)(1), (b)(2)):

Cordova Telephone Company, Inc.
611 2nd St., Cordova, AK 99574

Date of Planned Service Discontinuance (47 C.F.R. § 63.71(a)(2), (b)(2)):

CTC plans to discontinue offering its local exchange service in Strawberry Point on or after August 15, 2018, subject to Commission approval of the instant Application.

Points of Geographic Areas of Service Affected (47 C.F.R. § 63.71(a)(3), (b)(2)):

CTC will discontinue service on the eroding beach on the outwash plain created by the glaciers that once filled the bay on Strawberry Point, populated by cabins that are mostly used on a seasonal basis:

Latitude: 59° 26' 57.1" (59.4492°) north
Longitude: 139° 34' 38.7" (139.5774°) west
Elevation: 8 meters (26 feet)

Brief Description of Type of Service Affected (47 C.F.R. § 63.71(a)(3), (b)(2)):

CTC is discontinuing the offering of landline-based local exchange carrier service and related access to interexchange carrier service. CTC is discontinuing this service due to severe beach erosion that has caused the cables and wires of its landline network to be exposed to the elements and threatened with possibly being washed out to sea. CTC currently has zero subscribers for this service. The Strawberry Point site was originally launched in 2006 for "seasonal" (hunting, fishing) service. There was one year-round subscriber until 2011. The maximum number of subscribers was 15, with 14 of those being seasonal residents. In 2015 there were 3 subscribers to the service. The last subscriber terminated landline service in February 2017. Cordova Wireless currently supports Strawberry Point with 3G and 4G/LTE service.

With zero subscribers and the availability of robust wireless services in the Strawberry Point area, CTC has no choice but to remove its landline equipment before it becomes inoperable or lost at sea.

Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3)):

On June 29, 2018, CTC sent the attached notification to all residences previously served by its local exchange carrier service on Strawberry Point (*see* Attachment A). These notifications encourage CTC customers to use currently available wireless services. CTC will assist these customers if they have any questions or concerns. Copies of this Application are being sent to relevant parties via First Class U.S. Mail pursuant to Section 63.71(a) of the Commission's Rules.³

Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

CTC is a dominant provider with respect to the local exchange service to be discontinued.

Questions about this Application may be addressed to Kenneth Johnson, counsel for Cordova Telephone Cooperative, Inc., 6720-B Rockledge Drive, Suite 150, Bethesda, MD 20817, (202) 827-0664.

Conclusion:

The Public convenience and necessity will not be adversely affected by the discontinuance of landline-based local exchange carrier service that is no longer being used⁴ and that has already been replaced by more technologically advanced and robust wireless-based telecommunications services. CTC respectfully requests that the Commission approve its Section 63.71 Application to discontinue the offering of the service discussed herein.

Respectfully submitted,

CORDOVA TELEPHONE COOPERATIVE, INC.

By: */s/ Kenneth C. Johnson*

Kenneth C. Johnson
Herman & Whiteaker, LLC
6720-B Rockledge Drive, Suite 150
Bethesda, MD 20817
(202) 827-0664

Its Attorney

Dated: June 29, 2018

³ 47 C.F.R. § 63.71(a).

⁴ As noted above, 47 C.F.R. § 63.71(g) creates a 31-day grant window in such circumstances.

ATTACHMENT A

Cordova Telephone Cooperative, Inc.
611 2nd Street, P.O. Box 459
Cordova, Alaska 99574



Important Notice of Discontinuance of Cordova Telephone's Local Exchange Carrier Service

<<Customer Name>>

Thank you for using Cordova Telephone for your telecommunications needs. On or after August 15, 2018, subject to approval from the FCC, Cordova Telephone will no longer provide local exchange service and long distance access in the Strawberry Point area due to environmental conditions. We encourage you to consider our wireless services as an alternative. Our wireless service in this area has been significantly improved, which will be a more robust and reliable service than wireline-based local exchange carrier service for this service area.

Our experienced team is here to help you choose a new way to receive telecommunications service. Please call us at 907-424-2345.

Thank you for choosing Cordova Telephone Cooperative.

FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 30 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Cordova Telephone Cooperative, Inc. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

Section 63.71(a) and (b) of the FCC's rules require Cordova Telephone to provide the following information: Name and Address of Carrier that will be ceasing to offer local telecommunications service: Cordova Telephone Cooperative, Inc., 611 2nd St., Cordova, AK 99574.

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2018, I caused the foregoing Discontinuance of Service Application to be sent by U.S. Mail to the following parties:

Secretary of Defense
ATTN: Special Assistant for
Telecommunications
Pentagon
Washington, DC 20301

Regulatory Commission of Alaska
701 West 8th Avenue
Suite 300
Anchorage, AK 99501-3469

Office of the Governor
Governor Walker
P.O. Box 110001
Juneau, AK 99811-0001

Alaska Federation of Natives
300 A Street, Suite 210
Anchorage, AK 99503

/s/ *Kenneth C. Johnson*
Kenneth C. Johnson